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Attorneys for NewRez LLC dba Shellpoint Mortgage Servicing

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

NEWREZ LLC DBA SHELLPOINT
MORTGAGE SERVICING,

Plaintiff,

vs.

JOEL A. STOKES AND SANDRA F. STOKES,
as trustees of the JIMI JACK IRREVOCABLE
TRUST; DOE INDIVIDUALS I-X, inclusive,
and ROE CORPORATIONS I-X, inclusive,

Defendants.

Case No.: 2:20-cv-00946-JCM-BNW

**STIPULATION AND ORDER TO
EXTEND DISPOSITIVE MOTION
DEADLINE**

(SECOND REQUEST)

Plaintiff NewRez LLC dba Shellpoint Mortgage Servicing (**Shellpoint**) and defendants Joel A. Stokes and Sandra F. Stokes, as Trustees of the Jimi Jack Irrevocable Trust (**the Trust**), by and through their attorneys of record, file this stipulation to extend the deadline to file dispositive motions by thirty (30) days, or until **March 28, 2022**. In support of this stipulation, the parties state as follows:

1. On August 17, 2021, the Court issued a minute order granting Shellpoint's motion to compel as to non-party Keynote Properties, LLC. (ECF No. 33). The minute order extended discovery through October 1, 2021 and stayed the dispositive deadline.

2. On September 3, 2021, the parties filed a joint status report regarding the completion of remaining discovery. (ECF No. 34). Shellpoint requested the Court further extend the discovery deadline to December 15, 2021.

3. On September 7, 2021, the Court issued a second minute order granting Shellpoint's request and extending discovery through December 15, 2021. (ECF No. 35). The Court further directed Shellpoint to file a follow-up status report, which Shellpoint timely filed on October 15, 2021. (ECF No 36).

4. On January 14, 2022, the parties filed a stipulation to lift the stay and reset the dispositive deadline. (ECF No. 37). The stipulation requested the Court reset the dispositive deadline for February 11, 2022.

5. On January 18, 2022, the Court granted the parties' stipulation and set the dispositive deadline for February 11, 2022. (ECF No. 38).

6. Since this time, the parties have engaged in settlement discussions to gauge the potential for resolution. The parties submitted a stipulation extending the dispositive deadline by two weeks on February 10, 2022. (ECF No. 39). The court granted the stipulation on February 11, 2022. (ECF No. 40).

7. The parties continue to engage in settlement discussions to see if a potential resolution is possible. Due to some unforeseen delays, this process has taken longer than previously expected. The parties therefore agree to a thirty (30) day extension to the dispositive deadline to allow the parties to continue discussions.

8. The parties believe this extension serves both the interests of the parties and judicial economy, as it would allow the parties to continue exploring whether resolution is possible before incurring additional expenses on dispositive briefing. The parties believe the requested amount of time will be sufficient to gauge whether resolution is possible.

9. Based on the foregoing, the parties submit good cause supports the requested extension to March 28, 2022, and respectfully request the court grant the same.

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10. This is the parties' second request to extend the current dispositive deadline. The parties remain mindful of the court's need to move matters along its docket and enter into this stipulation in good faith and not for the purposes of delay or prejudice to any party.

DATED: February 24, 2022.

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/s/ Nicholas E. Belay

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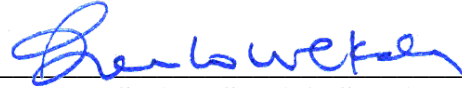
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*Attorneys for Joel A. Stokes and Sandra F.
Stokes, as Trustees of the Jimijack Irrevocable
Trust*

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

Case No.: 2:20-cv-00946-JCM-BNW

DATED: 2/25/2022

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